

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

LAURA ABRAMS on behalf of herself  
and all others similarly situated,

Plaintiff,

v.  
THE SAVANNAH COLLEGE OF ART  
AND DESIGN, INC.,

Defendant.

CIVIL ACTION NO.  
1:22-CV-04297-LMM

**PLAINTIFF’S UNOPPOSED MOTION  
FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

Under Fed. R. Civ. P. 23(e), Plaintiff Laura Abrams (“Plaintiff”) respectfully moves this Court for Final Approval of the Class Action Settlement because the Settlement is fair, reasonable, and adequate. The \$375,000.00 Settlement Fund is a substantial recovery for the approximately 16,890 Class Members.

In support thereof, Plaintiff relies upon the accompanying Memorandum of Law in Support of Plaintiff’s Motion for Final Approval of Class Action Settlement; the Declaration of Terence R. Coates in Support of Plaintiff’s Unopposed Motion for Final Approval of Class Action Settlement (“Coates Decl.”) attached as **Exhibit 1**; the Declaration of Bryn Bridley of Atticus Administration, LLC on Notice and Settlement Administration (“Atticus Decl.”) attached as **Exhibit 2**; the Declaration of Laura Abrams in Support of Final Approval of Class Action Settlement and

Plaintiff's Motion for Attorneys' Fees and Litigation Expenses ("Abrams' Decl.") attached as **Exhibit 3**; Plaintiff's Unopposed Motion for Preliminary Approval, previously granted; records, pleadings, and papers filed in this action; and such other evidence or argument that may be presented to the Court at or before the September 22, 2023 Final Approval Hearing. For the Court's convenience, a Proposed Order Granting Final Approval to the Class Action Settlement is attached as **Exhibit 4**.

Respectfully submitted this 8th day of September, 2023.

/s/ N. Nickolas Jackson

N. Nickolas Jackson

Georgia Bar No. 841433

**THE FINLEY FIRM, P.C.**

3535 Piedmont Road

Building 14, Suite 230

Atlanta, GA 30305

(t) (404) 320-9979

(f) (404) 320-9978

njackson@thefinleyfirm.com

Terence R. Coates (*appearing PHV*)

Justin C. Walker (*appearing PHV*)

Dylan J. Gould (*appearing PHV*)

**MARKOVITS, STOCK & DE MARCO, LLC**

119 E. Court Street, Suite 530

Cincinnati, OH 45202

(t) (513) 651-3700

(f) (513) 665-0219

tcoates@msdlegal.com

jwalker@msdlegal.com

dgould@msdlegal.com

*Counsel for Plaintiff and the Settlement Class*

**CERTIFICATE OF SERVICE AND**  
**LOCAL RULE 7.1(D) CERTIFICATION**

I hereby certify that on September 8, 2023, I electronically filed the foregoing with the Clerk of Court using the ECF system, which will send notification of such filing and effectuate service to all counsel of record in this matter, pursuant to Local Rule 5.1.

I further certify that this Motion has been prepared with one of the fonts and point selections approved by the Court in Local Rule 5.1(C).

/s/ N. Nickolas Jackson

N. Nickolas Jackson

*Counsel for Plaintiff and the Settlement Class*